



May 14, 2019

Dr. Kathleen Racher  
Chair, Giant Mine Oversight Board  
Box 1602  
5014-50<sup>th</sup> Avenue  
Yellowknife NT X1A 2P2

Dear Dr. Racher:

On behalf of the Giant Mine Remediation Project team, I am writing to request clarification and additional information from the Giant Mine Oversight Board (GMOB) with respect to progress identifying new technologies to address the arsenic trioxide currently stored underground at Giant Mine.

At the May 1, 2019, GMOB Public Meeting, a member of your Board – Mr. David Livingston - in response to a suggestion from a member of the public that the freeze-in-place program should be discontinued stated it was a question that had occurred to him and that it had been discussed with the Project team.

This comment took us all by surprise. For the record, the Project team has throughout this process discussed with GMOB: the plan to freeze the arsenic trioxide in place; that concurrently, research into alternate solutions to managing the arsenic would be investigated; and that in the interim, freezing-in-place constituted the most realistic, viable and safe solution. Prior to the public meeting the Oversight Board had indicated their support for our plan as outlined above.

Further to his initial comment, Mr. Livingston also stated that he was confident that within the next 20 years, an alternate solution would be found that would resolve the arsenic issue.

As you are aware, the most recent State of Knowledge Report conducted by the Giant Mine Oversight Board re-affirmed that, as stated in the Plain Language Summary of the Report on the Board's website: ***"more detailed studies are needed before the alternatives to the frozen block method could be considered for the Giant Mine site."***

Mr. Livingston's comments seem to suggest that the above-noted "detailed studies" have since happened and there is a new solution to managing the arsenic. If such is the case, would the Giant Mine Oversight Board be prepared to share this information with our Project team?

As confirmed through the Environmental Assessment, freezing the arsenic trioxide in place is currently the best-available strategy for the long-term management of the arsenic trioxide and that this approach protects people and the environment. The decision to put forward this option came after three years (2001-2003) of extensive scientific and technical research, coupled with community consultation. The Project team considered 56 options for managing the arsenic. Twelve were studied in detail. Of these, the frozen block method was ultimately chosen based on scientific evidence, community input, and support from the Independent Peer Review Panel. Of all the options considered, it poses the fewest risks overall. Specifically:



- Lowest risk to the health and safety of the workers;
- Lowest risk to community health and safety; and
- Lowest risk of the potential for short and long-term release of arsenic into the environment.

Safety was the most important consideration in choosing the frozen block method to address the arsenic trioxide waste. At this time, removing the waste would be unsafe for the workers and for the nearby communities. In addition, it is currently not possible to get all the waste out of the chambers and stopes, meaning these areas would require additional levels of management. Any waste removed from the site, would require that it be properly stored and with extensive and stringent monitoring and security. Further, doing this would create additional contaminated sites.

Taking these factors into consideration, to date all research, including that done on behalf of the Giant Mine Oversight Board, has shown that the safest way to manage the waste is to freeze it where it is, undisturbed, and in that way prevent it from contaminating underground water.

Based on these conclusions, the Giant Mine Remediation Project team has submitted its application for a Type A Water Licence to the Mackenzie Valley Land and Water, which includes the Frozen Block Method as part of the plan to ensure the safety of residents.

If the Giant Mine Oversight Board is advocating for an alternative method for managing the arsenic trioxide waste, the Project team will, in order to consider any alterations to the current management plan, require documentation with supporting evidence.

Furthermore, any alternative plans would have to provide a level of human health and safety and environmental protection equal to or greater than that which would be achieved through the freeze-in place plan.

I look forward to hearing from you at your earliest convenience.

Sincerely,

Natalie Plato  
Deputy Director  
Giant Mine Remediation Project